

REVIEW OF STATE INSPECTION REPORTS

Review of State Inspection Reports

- (A) Verify that CMEL has been filled out in accordance with the inspection report.
- (B) Determine if a Class I Violation and/or high priority Class I Violation exists.

If it exists, determine from CMEL what type of action the State has taken to correct the violation. (NOV/LOW) as a first step.

- (C) A synopsis with each Class I violation report will be provided.
- (D) If only a Class II Violation(s) or no violations, these inspection reports will be sent to the file.

1. Facility Name Container Products City/State Fenton, Mo.
EPA I.D. Number MOD003939907
2. Date of Inspection Conducted 9/28/87 *Not in DATA base as of 12/09/87*
3. Class of Violation Need to develop contingency plan
4. Type of Violation Class I Manifest *Storage over 90 days H.W. + 5 other violations listed*
5. NOV/LOW issued YES ☒ NO ☐
Date of NOV/LOW 9-28-87
6. Type of Facility TSD LDF GEN ☒ TRANS SQG Non Handler
7. Inspector(s) Name Michael Wolf
8. Was EPA inspector present YES ☐ NO ☒
Inspector's Name _____

Provide copy of inspection report if State Coordinator needs report.

Comments: Printout shows not in compliance w/NOV.

Information provided by Joan Lee

Date 12/8/87

Date of Form 11/17/87 JLee



R00151170
RCRA RECORDS CENTER

27.080 Container Product
U.S. Steel

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

October 9, 1987

LOW# 87-SL.048

Mr. Larned Justin
Supervisor of Purchasing
Container Products-U.S. Steel
2391 Cassens Drive
Fenton, Missouri 63026

Dear Mr. Larry Vito:

Enclosed, please find a report of an inspection conducted by Mr. Mike Wolf of my staff. The report documents a UNSATISFACTORY FEATURES warranting the issuance of NOTICE OF VIOLATION number 1263 (enclosed). Please review the enclosures and submit the written information as directed in the notice.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Walt Puryear
Walt Puryear
Chief, Waste Management Unit
St. Louis Regional Office

Encl.

CC: ☒ Mr. Art Groner - WMP
Irving A. Rubin, Container Products-U.S. Steel

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WASTE MANAGEMENT
PROGRAM



MISSOURI DEPARTMENT OF NATURAL RESOURCES
**NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS**

1263

CO

FACILITY NAME <u>Container Products, Inc.</u>			
ADDRESS <u>2391 Cassens Drive</u>		CITY <u>Fenton</u>	STATE <u>MO</u>
MISSOURI ID NUMBER <u>01372</u>		DATE OF INSPECTION <u>Sept. 28, 1987</u>	

During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.

CITATION	DESCRIPTION OF VIOLATION
10 CSR 25-5.262(2)(c)1.	Failure to mark and label drums of hazardous waste.
40 CFR 262.34	Storage of hazardous wastes for greater than 90 days.
10 CSR 25-5.262(2)(A).	Failure to register all hazardous waste streams.
40 CFR 265.16	Failure to maintain personnel training requirements.
40 CFR 265 Subpart D	Failure to develop a contingency plan.
10 CSR 25-11.010	Disposal of waste oil into the environment.
40 CFR 262.20	Shipment of haz. wastes without use of manifest.

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**WASTE MANAGEMENT
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This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Waste Management Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Administrator, St. Louis Regional Office.

The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this notice or wish to discuss your response, you may call Mr. Walt Puryear at 849-1313 or Mr. Art Groner at 751-3176.

Signature of Preparer Michael J. Wolf Date 10/2/87

The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.

SIGNATURE	PRINTED NAME
TITLE	DATE

HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTION REPORT

FACILITY

Container Products, Inc.
2391 Cassens Drive
Fenton, Missouri 63026
(314) 343-7333

MO Generator #: 01372
EPA #: MOD003939907

INTRODUCTION

An inspection of the above facility was conducted on September 28, 1987 to assess compliance with applicable regulations of the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law. Mr. Michael Wolf, Environmental Specialist, represented the Missouri Department of Natural Resources. Mr. Larned Justin, Supervisor of Purchasing and Inventory Control, and Mr. Larry Vito, Supervisor of Quality Assurance, represented the facility. Mr. Justin assumed responsibility for hazardous waste management in July of 1987. The facility was owned by U. S. Steel until 1984.

Container Products, Inc. manufactures steel drums in 16-, 30-, and 55-gallon sizes. Sheet steel is rolled and shaped, cleaned with a zinc phosphate solution, and painted per customer specifications. The company generates three hazardous waste streams:

1. Spent Xylene/Methyl Ethyl Ketone blend (F003/F005), from the cleanup of lithographic plates, paint lines, and a lacquer application line. This waste is generated at the rate of approximately 1,700 gallons per month, and is transported to Clayton Chemical Company (#ILD066918327) in Sauget, Illinois for resource Recovery.
2. Spent petroleum naphtha (D001), from recirculating parts cleaners, is generated at the rate of 15 gallons per month and is reclaimed under a contractual agreement with Safety-Kleen. The facility has not registered this waste stream with the Department.
3. Waste oil, from a skimming operation at the company's waste water treatment facility as well as oil changes to company equipment. This waste is generated at the rate of approximately 50 gallons per month and is picked up by the Kiesel Company of St. Louis, Missouri for resource recovery.

Two additional hazardous waste streams have been registered by the facility: 1) Industrial process waste water from the drum cleaning operation, generated at the rate of approximately 48,000 gallons per month. This waste does not appear to be hazardous and is trucked to a Metropolitan Sewer District plant for treatment and disposal. 2) Zinc phosphate sludge from the drum cleaning operation, generated at the rate of approximately 2100 gallons per month. A copy of a recent analysis performed on this waste indicates it to be not hazardous. The sludge is trucked to West County Disposal, Ltd. Sanitary Landfill in Valley Park, Missouri for disposal.

UNSATISFACTORY FEATURES

The following unsatisfactory features were noted during the facility inspection. The 40 CFR Regulations cited have been adopted by reference in the Missouri Hazardous Waste Regulations. Notice of Violation #1263 citing these violations is included with this report.

1. Failure to maintain marking and labelling requirements on containers of hazardous waste in storage, in violation of 10 CSR 25-5.262(2)(C)1. and 40 CFR 262.32.
2. Failure to remove hazardous wastes generated on site in less than 90 days, in violation of 40 CFR 262.34.
3. Failure to register all hazardous waste streams with the Department, in violation of 10 CSR 25-5.262(2)(A).
4. Failure to maintain personnel training requirements, in violation of 40 CFR 265.16.
5. Failure to develop a contingency plan, in violation of 40 CFR 265 Subpart D.
6. Failure to properly maintain the waste oil storage area and failure to prevent disposal of waste oil into the environment, in violation of 10 CSR 25-11.010.

7. Failure to utilize hazardous waste manifests for the off-site shipment of some hazardous wastes, in violation of 40 CFR 262.20.

COMMENTS

The Xylene/MEK waste stream is generated through three processes within the plant: cleanup of spray paint equipment at two paint lines, cleanup of lacquer application equipment (a lacquer coating is applied to the interiors of some drums), and cleanup of lithographic plates used to print customer logos, etc. on drums. Wastes are accumulated in satellite storage at these four stations prior to transfer to the plant's hazardous waste storage area on the south side of the property. The only drum of waste observed in satellite storage met all satellite storage standards. Observed within the containment system in the outside storage area were thirty-four 55-gallon drums. Only two of these drums were labelled as containing hazardous wastes. One of these was marked with an accumulation date of June 5, 1987, indicating that this drum was in storage for more than the 90 days permitted.

The remaining drums were unmarked and unlabelled. Although several appeared to be empty, most were full or partially full. Mr. Justin explained that these drums contained paint solids remaining from the recent shipment of a large accumulation of hazardous wastes in storage since 1984, when U. S. Steel sold the company. Responsibility for a large number of drums of product and waste had been in dispute, and not until September of 1987 were the drums emptied and transferred to Clayton Chemical for resource recovery. Mr. Justin stated that the remaining paint solids, which have now been on site for approximately three years, were to be shipped for off-site disposition as a hazardous waste within several weeks.

Adjacent to the hazardous waste storage area were approximately ten 55-gallon drums of waste oil. A large volume of spilled oil and oil-saturated soil was also observed. This appeared to be the result of poor housekeeping rather than one large spill. Cleanup of the spilled oil and contaminated soil and improved housekeeping is necessary.

Mr. Justin was unable to provide documentation that Container Products, Inc. has provided hazardous waste training to facility personnel. He was also unable to provide a copy of a contingency plan for the facility. An inspection of this facility by the Department in 1983 also cited the lack of these requirements. Although followup to that inspection indicated that the company was "substantially in compliance" with the recommendations of the inspection, the new ownership has apparently not met these generator standards.

Manifests inspected were found to be properly completed. However, off-site shipments of the spent naphtha by Safety-Kleen have not been accompanied by manifests. (The shipments have been accompanied by other Safety-Kleen documentation). Because Container Product's total waste generation is greater than 1000 kilograms per month, the manifest exemption for reclamation agreements outlined in 40 CFR 262.20(e) would not apply. Manifests must therefore accompany all off-site shipments of hazardous waste.

Quarterly summary manifest reports have been submitted to the Department and were found to be properly completed.

RECOMMENDATIONS

1. Immediately mark and label drums of hazardous waste in storage.
2. Make arrangements for the immediate removal of all wastes in storage for greater than 90 days.
3. Submit an updated registration form to the Department reflecting all hazardous waste streams generated at the facility.
4. Conduct hazardous waste training for facility personnel to ensure that they are familiar with the hazardous waste regulations and are able to respond effectively to hazardous waste emergencies. Provide annual reviews of the initial training, and maintain the required documentation for the training.
5. Develop a contingency plan for the facility which is designed to minimize the hazards from hazardous waste emergencies, meeting the requirements of 40 CFR 265 Subpart D.
6. Arrange for cleanup of all oil-saturated soil and disposal of that soil as a special waste in a permitted sanitary landfill. Improve site maintenance to avoid future accumulation of waste oil spills, possibly including the installation of a waste oil storage tank or a containment system.
7. Utilize hazardous waste manifests for off-site shipments of waste naphtha.

(5)

On October 1, 1987 Mr. Justin provided the Department with a copy of a RCRA audit of the facility conducted by corporate representatives on September 16 and 17, 1987 (two weeks prior to the Department's inspection). Recommendations of this audit included the establishment of an employee training program, expansion of a facility contingency plan to include the hazardous waste requirements and improvements to facility storage standards.

If there are any questions concerning this report, please contact Mr. Wolf at 314-849-1313.

APPROVED BY:



FDM F. Donald Maddox
Regional Administrator
St. Louis Regional Office

PREPARED BY:



Michael J. Wolf
Environmental Specialist
St. Louis Regional Office

FDM/MW/dc

CC: Central Office, Waste Management Program

HAZARDOUS WASTE GENERATOR CHECKLIST

Name of Facility: Container Products, Inc. - ~~Fenton Plant~~Date: 9/28/87 F/CBAddress: 2391 Cassens Dr.Fenton, MO 63026Missouri I.D. # 01372Facility Representative: Mr. Larned JustinEPA I.D. # MO D003934407Title: Supervisor Purchasing / Inventory ControlPhone Number 314-343-7333Is this facility a TSD? NoTransporter? No, #

Provide a brief description of the manufacturing process.

Manufacturer of steel drums (16, 30, 55 gal.)

List the hazardous wastes generated:

Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1. <u>spent xylene / MEK</u>	<u>1700 gal</u>	<u>~13,600 kg</u>	<u>F003/F005</u>	<u>RR</u>
2. <u>spent petroleum naphtha</u>	<u>15 gal</u>	<u>~ 120 kg</u>	<u>D001</u>	<u>RR</u>
3. <u>waste oil</u>	<u>50 gal</u>	<u> </u>	<u> </u>	<u>RR</u>
4. <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5. <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
6. <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Total	<u>1700 gal</u>	<u>~15,040 kg</u>		

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Annual generation rate for time period of July 1 through June 30:

Total amount of waste generated on an annual basis. ~ 180.5 kkg.Amount of waste land disposed on annual basis. 0 kkg.Amount of waste stored under permit conditions on annual basis. 0 kkg.Amount of waste managed by all other methods on annual basis. ~ 180.5 kkg.Is the category tax (Section 260.478 RSMo.) applicable? ✓ yes noIs the tax being paid? yes noIs the \$25 land disposal tax (Section 260.475 RSMo.) applicable? yes ✓ noIs it being paid? yes noIs the \$1.00 generator fee applicable? yes ✓ noIs it being paid? yes noIf the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes No N/AIf the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes No N/A

If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year?

Yes No N/AHas the generator determined if waste is hazardous? Yes ✓ No

HAZARDOUS WASTE GENERATOR CHECKLIST

Page Two

A. Manifests and Recordkeeping 10 CSR 25-5.262(1) and 5.262(2)(D)

1. Generator's MO and EPA I.D. Numbers(✓)
2. Serially Increasing shipment number(✓)
3. MO waste I.D. # correct.....(✓)
4. Generator's name, address, phone #.....(✓)
5. All transporters' names, phone #'s, MO and EPA I.D. #'s.....(✓)
6. Designated facility name, address, phone # and EPA I.D. #.....(✓)
7. Proper DOT Shipping Name, Hazard Class and I.D. #.....(✓)
8. Containers, Quantity and Unit Wt/Vol being shipped properly designated.....(✓)
9. Proper certification.....(✓)
10. Manifest properly signed and dated.....(✓)
11. No more than 10 days time between generator and facility signatures.....(✓)
12. Manifests returned within 35 days.....(✓)
13. If not, exception generator report submitted within 45 days.....N/A.()
14. Completed manifests submitted to DNR quarterly.....(✓)
15. Summary Manifests Report submitted to DNR quarterly.....(✓)
16. Biennial Report.....? ()

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(1) and 5.262(2)(C)1

17. Waste stored in proper DOT containers.....(✓)
18. Containers/Tanks labeled "Hazardous Waste" and labeled per proper DOT requirements during storage.....()
19. Placards available for use by transporters.....(✓)

C. STORAGE STANDARDS 10 CSR 25-5.262(1) and 5.262(2)(C)2

20. Facility inspected and maintained.....(✓)
21. Ignitable and reactive wastes properly handled.....(✓)
22. Date of accumulation marked.....(✓)
23. Storage less than 90 days (if applicable).....()
24. Satellite Accumulation requirements met (if applicable).....(✓)
 - a. Stored in satellite areas less than 1 year.....(✓)
 - b. Container marked identifying contents and beginning date.....(✓)
 - c. Containers kept closed / compatible / good condition.....(✓)
 - d. Quantities accumulated not exceeding 55 gal. (1 quart acutely hz waste).....(✓)

D. CONTAINER STORAGE 10 CSR 25-5.262(1) and 5.262(2)(C)2

25. Containers in good condition.....(✓)
26. Containers kept closed in storage.....(✓)
27. Containers storing incompatible waste separated or protected from each other.....(✓)
28. Containers of ignitable or reactive waste stored > 50 feet from property line.....(✓)
29. Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.E.....(✓)

E. STORAGE TANKS 10 CSR 25-5.262(1) and 5.262(2)(C)2.F.

30. Tanks in good condition.....()
31. Procedure for assessing condition of tanks.....()
32. Above ground tanks - adequate spill confinement systems / inspected weekly.....()
33. Underground tanks that cannot be entered have adequate leak detection systems.....()
34. Leak detection procedure and schedule developed and used.....()
35. Open tanks have _____ ft. freeboard.....()
36. Incompatible wastes stored safely and properly.....()
37. Volatiles are not placed in open tanks.....()
38. Ignitable or reactive wastes stored safely and properly.....()

39. Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements.....()
40. Controls to prevent overfilling.....()
41. Daily inspection of overfilling control equipment.....()
42. Daily inspection of freeboard in uncovered tanks.....()
43. Covered in contingency plan.....()

HAZARDOUS WASTE STORAGE TANKS

WASTE CONTAINED

VOLUME OF TANK

For storage or generation in any month of over 1000 kg, complete the following additional three sections:

F. PERSONNEL TRAINING 10 CSR 25-5.262(1)

44. Completed classroom or on-the-job training.....()
45. Job title, description, and name of person filling position.....()
46. Written record of the type and amount of training given.....()
47. Documentation confirming that training has been given.....()

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(1) and 5.262(2)(C)2.H.

48. Internal communication or alarm system.....(✓)
49. Device in the hazardous waste operation area capable of summoning emergency assistance.....(✓)
50. Fire control, spill control, and decontamination equipment available.....(✓)
51. Adequate water supply for fire control equipment.....(✓)
52. Adequate and proper safety equipment available.....(✓)
53. Adequate aisle space.....(✓)
54. Arrangements with local emergency agencies.....(✓)

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(1)

54. Contingency Plan.....()
55. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste.....()
56. Describe formal arrangements with emergency agencies.....()
57. Names, addresses, and phone numbers (home & office) of emergency coordinators.....()
58. Emergency equipment including its description and location.....()
59. Evacuation plan if applicable.....(✓)

I. WASTE OIL 10 CSR 25-11.010

60. Waste oil properly handled.....()

COMMENTS: cleanup of oil-saturated soil required.
 Need to register naphtha waste stream.
 Some wastes in storage approx 3 years.

Please mark boxes as shown (✓) In compliance

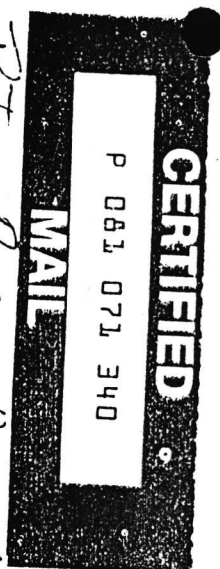
Inspector's Signature Michael Miel In violation

Title Environmental Specialist

Office SLRO



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
P.O. Box 176
Jefferson City, MO 65102



Return Receipt Requested

Mr. Larned Justin
Supervisor of Purchasing
Container Products - U.S. Steel
2391 Cassens Drive
Fenton, MO 63026

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WASTE MANAGEMENT
PROGRAM

PS Form 3811, July 1983 447845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.	
1. <input checked="" type="checkbox"/> Show to whom, date and address of delivery.	
2. <input type="checkbox"/> Restricted Delivery.	
3. Article Addressed to: Mr. Larned Justin Superv of Purchasing Container Product sU.S. Steel 2391 Cassens Drive Fenton, MO 63026	
4. Type of Service: <input checked="" type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	Article Number P 081 071 340
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee X	
6. Signature - Agent X	
7. Date of Delivery	
8. Addressee's Address (ONLY if requested and fee paid)	